

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

BUNDREN LAW GROUP, PLLC.)
Plaintiff,) FILED UNDER SEAL
v.)
ATLANTIC SPECIALTY) CIVIL ACTION NO.
INSURANCE COMPANY, *et. al.*) 4:24-CV-00900
Defendants.)

**PLAINTIFF'S MOTION TO FILE CERTAIN DOCUMENTS UNDER
SEAL REGARDING PLAINTIFF'S RESPONSE TO JIM HOFT AND
TGP COMMUNICATIONS, LLC'S MOTION TO DISMISS
PLAINTIFF'S FIRST AMENDED COMPLAINT**

TO THE HONORABLE COURT:

BUNDREN LAW GROUP, PLLC ("Plaintiff" or "BLG") moves to file certain documents (Exhibits) in support of Plaintiff's response in opposition to JIM HOFT (Hoft") and TGP COMMUNICATIONS, LLC's ("TGP") (collectively referred to as "TPG" unless distinction is necessary), Motion to dismiss Plaintiff's First Amended Complaint (Dkt. #43) ("TGP's Motion") under seal, and says:

I.

Certain documents which Plaintiff relies on in Plaintiff's Response to the Motion to Dismiss (Dkt.#43) of JIM HOFT and TGP COMMUNICATIONS, LLC

of Plaintiff's First Amended Complaint contain information which contains attorney-client privileged and confidential and work product information. The exhibits are Invoices submitted to the Insurance Companies, TGP, Jim Hoft and Joe Hoft which contain details of legal work performed by Bundren Law Group, PLLC for Defendants in the Freeman Moss Litigation, and Plaintiff is concerned that filing the Exhibits would disclose attorney-client privileged and confidential and work product information in that Litigation. Nevertheless, Plaintiff relies on those exhibits in response to the motion to dismiss. In the interest of protecting the information, Plaintiff moves the court to allow Plaintiff to file the documents under seal in accordance with Local Rule CV-5 (7) of the United States District Court for the Eastern District of Texas.

This motion is filed separately and immediately before the documents sought to be sealed in compliance with Local Rule CV-5 (7) (C) of the United States District Court for the Eastern District of Texas.

Plaintiff's counsel will serve these documents to opposing counsel in electronic form as required by Local Rule CV-5 (7)(D) of the United States District Court for the Eastern District of Texas.

In accordance with Local Rule CV-5 (7)(E) of the United States District Court for the Eastern District of Texas, the entire Exhibits contain confidential information.

For these reasons, Plaintiff moves the court to seal these documents.

Dated: November 15, 2024.

Respectfully submitted,

By: /s/ Charles Bundren

BUNDREN LAW GROUP, PLLC
Wm. Charles Bundren, Esq.
Lead Attorney and Attorney-in Charge
State Bar No. 03343200
2591 Dallas Parkway, Suite 300
Frisco, Texas 75034
(214) 808-3555 Telephone
e-mail: charles@bundrenlaw.net
ATTORNEY FOR PLAINTIFF:
BUNDREN LAW GROUP, PLLC

CERTIFICATE OF SERVICE

This is to certify that on this 15th day of November, 2024, a true and correct copy of the foregoing document was served in accordance with the Federal Rules of Civil Procedure and the United States District Court for the Eastern District of Texas Local Rules on all legal counsel of record for any party by serving the following:

KLEMCHUK PLLC

Brian Casper, Esq.
Lead Counsel and Attorney-in-Charge
Texas State Bar No. 24075563
Email: brian.casper@klemchuk.com
Darren Michael Klemchuk, Esq.
Email: darin.klemchuk@klemchuk.com
Mandi Michelle Phillips, Esq.
Email: mandi.phillips@klemchuk.com
8150 N. Central Expressway, 10th Floor
Dallas, TX 75206
Phone: (214) 367-6000

Fax: (214) 367-6001
ATTORNEYS FOR DEFENDANT TGP

BURNS LAW FIRM

John C. Burns, Esq.
Missouri State Bar No. 66462
P.O. Box 191250
St. Louis, Missouri 63119
Phone: (314) 329-5040

Fax: (314) 282-8136
Email: john@burns-law-firm.com

ATTORNEY FOR DEFENDANTS:

TGP COMMUNICATIONS, LLC, AND JAMES "JIM" HOFT

RANDAZZA LEGAL GROUP, PLLC

Marc J. Randazza, Esq.
Nevada State Bar No. 12265
4974 S. Rainbow Blvd., Suite 100
Las Vegas, NV 89118
Phone: (888) 887-1776

Email: ecf@randazza.com

ATTORNEY FOR:
DEFENDANT TGP COMMUNICATIONS, LLC

FEE, SMITH & SHARP LLP

Daniel M. Karp, Esq.
Lead Counsel and Attorney-in-Charge
Texas State Bar No. 24012937
Three Galleria Tower
13155 Noel Road, Suite 1000
Dallas, TX 75240
Phone: (972) 980-3293
Fax: (972) 934- 9200
Email: dkarp@feesmith.com

ATTORNEY FOR DEFENDANTS:
ATLANTIC SPECIALTY INSURANCE COMPANY;
INTACT INSURANCE USA LLC; ONEBEACON PROFESSIONAL
INSURANCE, INC., a dissolved corporation; and,
ONEBEACON PROFESSIONAL INSURANCE GROUP, a fictitious entity.

Nicholas O'Connell
Intact Insurance Specialty Solutions
Intact U.S. Coverage Litigation Group
605 Highway 169 N.
Suite 800
Plymouth, MN 55441
Phone: (952) 852-0481
Fax: (877) 654-1527
Email: njoconnell@intactinsurance.com

Pro Hac Vice

ATTORNEY FOR DEFENDANT:
ATLANTIC SPECIALTY INSURANCE COMPANY

 X by the Court's CM/ECF Pacer electronic filing System pursuant to FRCP 5(b)(2)(E) and 5(b)(3), and LOCAL RULE CV-5 (c)&(d),

 by certified mail return receipt requested deposited with the United States Postal Service on the date indicated above pursuant to FRCP 5(b)(2)(C),

 by email at the email address indicated above pursuant to FRCP 5(b)(2)(E), and in accordance with the United States District Court for the Eastern District of Texas Local Rule CV-5(a)(7)(D) a copy of this document was served opposing counsel in electronic form by serving opposing counsel at the email addresses listed herein.

and/or

 by hand delivery service on the date indicated above pursuant to FRCP 5(b)(2)(A) and (B).

And to the non-represented Defendant by email and Federal Express delivery as follows for service or otherwise:

Joseph "Joe" Hoft
1820 NE Jensen Beach Boulevard, Suite 1120
Jensen Beach, FL 34957.

This document and the exhibits were served to opposing counsel and opposing parties by the electronic form by email in compliance with Local Rule CV-5 (7)(D) of the United States District Court for the Eastern District of Texas.

By: /s/ Charles Bundren
ATTORNEY FOR PLAINTIFF:
BUNDREN LAW GROUP, PLLC